

Exhibit 6

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 VALEANT PHARMACEUTICALS INTERNATIONAL,
 VALEANT PHARMACEUTICALS INTERNATIONAL, INC., and GALDERMA
 LABORATORIES, L.P.

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

ALLERGAN USA, INC., and ALLERGAN
 INDUSTRIE, SAS,

Plaintiffs,

v.

MEDICIS AESTHETICS, INC., MEDICIS
 PHARMACEUTICAL CORP., VALEANT
 PHARMACEUTICALS NORTH AMERICA
 LLC, VALEANT PHARMACEUTICALS
 INTERNATIONAL, VALEANT
 PHARMACEUTICALS INTERNATIONAL,
 INC., and GALDERMA LABORATORIES,
 L.P.

Defendants.

Case No.: SACV13-01436 AG
 (JPRx)

**INITIAL DISCLOSURES OF
 GALDERMA LABORATORIES,
 L.P.**

INITIAL DISCLOSURES OF
 GALDERMA LABORATORIES, L.P.

Case No.: SACV13-01436 AG (JPRx)

1 Defendant Galderma Laboratories, L.P. (“Galderma Labs” or “Defendant”), by
 2 its undersigned attorneys, hereby submits to Plaintiffs the following Initial Disclosures
 3 pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. In addition,
 4 Galderma Labs expressly reserves all objections to the use for any purpose of this
 5 Initial Disclosure or any of the information referenced herein in this case or any other
 6 case or proceeding.

7 By making these disclosures, Galderma Labs does not represent that they are
 8 identifying every document, tangible thing, or witness possibly relevant to all issues
 9 that may eventually be raised in this lawsuit. Pursuant to Rule 26(b)(1) and other
 10 applicable Federal Rules of Civil Procedure, Galderma Labs is not disclosing
 11 documents or information protected by the attorney-client privilege or work-product
 12 immunity. Galderma Labs’s disclosures represent a good faith effort to identify
 13 information it reasonably believes is required by Rule 26(a)(1).

14 Galderma Labs’s disclosures are made without in any way waiving: (1) the
 15 right to object on the ground of competency, privilege, relevancy and materiality,
 16 hearsay, or other proper ground; (2) the right to object to the use of any such
 17 information, for any purpose, in whole or in part, in any subsequent proceeding in
 18 these actions or any other action; and (3) the right to object on any and all grounds, the
 19 subject matter of these disclosures.

20 The disclosures set forth below are made subject to the above objections and
 21 qualifications.

22
 23 I. **Persons with Knowledge of Discoverable Information**

24 Rule 26(a)(1)(A)(i) prescribes the identification of:
 25 the name and, if known, the address and telephone number of each
 26 individual likely to have discoverable information — along with the
 27 subjects of that information — that the disclosing party may use to
 support its claims or defenses, unless the use would be solely for
 impeachment.

28 INITIAL DISCLOSURES OF
 GALDERMA LABORATORIES, L.P.

Case No.: SACV13-01436 AG (JPRx)

The following individuals are believed to be likely to have information defendant may use to support its claims or defenses:

Name	Contact Information	Subject Matter
Per Langö, Galderma Labs	c/o Patterson Belknap Webb & Tyler LLP 1133 Avenue of the Americas New York, NY 10036	Development of the Restylane-L® and Perlane-L® products.
Rick Lawrence, Galderma Labs	c/o Patterson Belknap Webb & Tyler LLP 1133 Avenue of the Americas New York, NY 10036	Marketing of Restylane-L® and Perlane-L®.
Peter Bjurling, Q-Med	c/o Patterson Belknap Webb & Tyler LLP 1133 Avenue of the Americas New York, NY 10036	Development of the Restylane-L® and Perlane-L® products.
Per Wimlos, Q-Med	c/o Patterson Belknap Webb & Tyler LLP 1133 Avenue of the Americas New York, NY 10036	Development of the Restylane-L® and Perlane-L® products.

Galderma Labs reserves the right to call any and all additional fact witnesses revealed during investigation or discovery that have relevant information regarding this lawsuit. Galderma Labs incorporates by reference the names of any and all persons disclosed by Plaintiffs and other Defendants through disclosures, answers to interrogatories, responses to requests for production or for admission, pleadings, or otherwise. Galderma Labs's investigation is ongoing and it reserves the right to modify, amend, or otherwise supplement this list of individuals based on investigation and further discovery as additional information becomes available.

1 **II. Relevant Documents**

2 Rule 26(a)(1)(A)(ii) calls for disclosure of:

3 a copy — or a description by category and location — of all documents,
4 electronically stored information, and tangible things that the disclosing
5 party has in its possession, custody, or control and may use to support its
claims or defenses, unless the use would be solely for impeachment.

6 By providing the following description of documents pursuant to Rule
7 26(a)(1)(A)(ii), Galderma Labs does not waive its right to withhold production of any
8 document in their possession which is protected by the attorney-client privilege, the
9 work-product immunity, or any other claim of privilege or immunity, or Galderma
10 Labs is prohibited from producing under a legitimate confidentiality agreement, or
11 where production of such a document would be otherwise unlawful.

- 12 1. The Inter Partes Review (“IPR”) petitions, declarations, and exhibits
13 submitted challenging both of the patents-in-suit.
- 14 2. Financial and other documents relating to the sales of Restylane-L[®] and
15 Perlane-L[®].
- 16 3. Documents related to the market and/or marketing of Restylane-L[®] and
17 Perlane-L[®].
- 18 4. Documents provided to Galderma by Valeant during or after the transfer
19 of rights to Restylane-L[®] and Perlane-L[®].

20 This initial disclosure is subject to additional or different information and
21 additional documents that future investigation may disclose, or should additional
22 claims be added by Plaintiffs.

23 **III. Computation of Damages**

24 Rule 26(a)(1)(A)(iii) calls for disclosure of:

25 a computation of each category of damages claimed by the disclosing
26 party—who must also make available for inspection and copying as
27 under Rule 34 the documents or other evidentiary material, unless
privileged or protected from disclosure, on which each computation is
based, including materials bearing on the nature and extent of injuries
suffered.

1 Galderma Labs does not seek damages at this time.

2 IV. **Insurance Agreement**

3 Rule 26(a)(1)(A)(iv) calls for disclosure of:

4 any insurance agreement under which an insurance business may be
5 liable to satisfy all or part of a possible judgment in the action or to
indemnify or reimburse for payments made to satisfy the judgment.

6 Galderma Labs is not aware of any such agreement at this time. Galderma Labs
7 reserves the right to supplement this initial disclosure if any pertinent insurance
8 agreements are later identified.

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10
11
12 Dated: December 29, 2014

By: /s/ William F. Cavanaugh
William F. Cavanaugh

13
14 PATTERSON BELKNAP WEBB & TYLER
LLP

15 *Attorneys for Defendants*
16 MEDICIS AESTHETICS, INC., MEDICIS
17 PHARMACEUTICAL CORP., VALEANT
18 PHARMACEUTICALS NORTH AMERICA
19 LLC, VALEANT PHARMACEUTICALS
INTERNATIONAL, VALEANT
PHARMACEUTICALS INTERNATIONAL,
INC., and GALDERMA LABORATORIES,
L.P.

PROOF OF SERVICE

I am employed in the County of New York, my business address is Patterson Belknap Webb & Tyler LLP, 1133 Avenue of the Americas, New York, New York 10036. I am over the age of 18 and not a party to the foregoing action.

On December 29, 2014, I caused a copy of the following document(s):

INITIAL DISCLOSURES OF GALDERMA LABORATORIES, L.P.

to be served on the interested parties in this action by ELECTRONIC MAIL, via the email addresses set forth below:

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I declare under penalty of perjury that the above is true and correct. Executed on December 29, 2014, at New York, NY.

/s/ William F. Schmedlin
 William F. Schmedlin